

Exhibit 1

Victorien Wu

From: Vic Wu
Sent: Wednesday, March 30, 2016 11:19 AM
To: Holmes.Adams@arlaw.com; JCompton@witherspooncompton.com
Cc: Natasha Merle; alexander.chanock@usdoj.gov; aria.vaughan@usdoj.gov; natane.singleton@usdoj.gov
Subject: Barnhardt v. Meridian Municipal Separate School District, No. 65-cv-1300 (S.D. Miss.)
Attachments: Confidentiality Agreement (00039768x9DDAC).docx

Dear Holmes and John,

On behalf of the Private Plaintiffs in the above-captioned case, we write to request that the Meridian Public School District (the "District") provide us with direct access to the biannual reports that it prepares pursuant to the May 30, 2013 consent decree. As you know, the District is currently required to submit these reports to the United States, which in turn provides these reports to the Private Plaintiffs. However, it has become apparent that the interests of time and efficiency would be better served by making these reports directly available to the Private Plaintiffs. Further, to address any concerns about the privacy of student records, we are willing to enter into the attached confidentiality agreement. We have had similar arrangements with other school districts in other desegregation cases, which have helped to avoid unnecessary delays and facilitate the exchange of information. We have consulted with Natane and Aria at the U.S. Department of Justice, and they agree that such an arrangement would be appropriate in this case.

Please let us know whether the District would be amenable to this arrangement or if you have any questions or concerns.

Best regards,

Vic

Victorien Wu
Fried Frank Fellow
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CONFIDENTIALITY AGREEMENT

WHEREAS, the Meridian Municipal Separate School District (hereafter referred to as the "District") and the Private Plaintiffs, represented by the NAACP Legal Defense and Educational Fund, Inc. ("LDF"), are currently parties in *Barnhardt v. Meridian Municipal Separate Sch. Dist. et al.*, Civil Action No. 4:65-cv-01300, in federal district court in the Southern District of Mississippi; and

WHEREAS, the District has agreed to share certain information with LDF in the context of this litigation, including the semiannual reports prepared by the District pursuant to paragraph 109 of the Consent Order entered on May 30, 2013;

In consideration of the District's agreement to provide to LDF such information, LDF agrees as follows:

- 1) LDF will comply with both federal and Mississippi laws regarding the privacy of student records.
- 2) LDF will adhere to all court rules regarding the protection of personal and sensitive information, including Local Uniform Civil Rule 5.2.
- 3) LDF will keep the identity and other personally identifiable information of individuals named in the provided documents confidential.

I, Victorien Wu, a person of the full age of majority and a legal representative of LDF, execute this statement of confidentiality in acknowledgement of the responsibilities associated with the possession of the above-referenced records.

THUS DONE AND SIGNED, on this _____ day of _____, 2016.

BY: _____ (Print)

_____ (Signature)

Authorized representative of the NAACP Legal Defense and Educational Fund, Inc.

Subscribed and sworn to or affirmed before me this ____ day of _____, 2016.

Notary Public
(Affix seal or stamp)